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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

**MINDS, INC., TIM POOL, THE
BABYLON BEE LLC, and
NATIONAL RELIGIOUS
BROADCASTERS,**

Plaintiffs,

v.

**ROBERT A. BONTA, Attorney
General of California, in his official
capacity,**

Defendant.

Case No.: 2:23-cv-02705-RGK-MAA

**PLAINTIFFS' SUPPLEMENTAL
STATEMENT RE MOTION TO
DISMISS AND PARTICULAR
COMPLAINT ALLEGATIONS**

Date: June 26, 2023
Time: 9:00 am
Courtroom: Roybal 850

1 Plaintiffs file this supplemental statement to bring to the Court's attention newly
2 discovered facts relevant to defendant's pending motion to dismiss (Dkt 23).

3 Plaintiffs' amended complaint alleges that "NRB member Salem Media Group Inc.
4 ('Salem Media') owns GodTube.com and TeacherTube.com, both of which allow users
5 to create public profiles, subscribe to other user's channels (thereby populating a list of
6 other users with whom the user connects), and post video content." (Dkt 20 ¶ 16.) On
7 June 15, 2023, Plaintiffs discovered that while this was true at one time, Salem Media has
8 since disabled some of these functions, and does not intend to reenable them, for reasons
9 other than the challenged statute. Accordingly, Plaintiffs no longer allege that Salem
10 Media is subject to the requirements of AB 587. (*See id.* ¶¶ 107, 121.) Plaintiffs maintain
11 the other allegations in the amended complaint, including that Salem has been accused of
12 spreading misinformation. (*Id.* ¶ 102.)

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15 Dated: June 16, 2023

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17 By: /s/ James R. Lawrence
18 James R. Lawrence, III

19 Attorneys for Plaintiffs Minds, Inc.,
20 Tim Pool, The Babylon Bee LLC, and
21 National Religious Broadcasters
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